

Congress of the United States

Washington, DC 20515

February 8, 2006

Mr. Eldon Gould, Administrator
Risk Management Agency
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Room 6092 South Building
Washington, DC 20250

Dear Administrator Gould:

We are writing to you regarding the Risk Management Agency's (RMA) use of written unit agreements, or "section equivalent policies." As you know, section equivalent policies have been of use to Northeast farmers, and proper guidelines on the use of these policies are vital.

We appreciate your decision to continue to allow the use of section equivalents in the Northeast in recognition that other risk management programs under serve many farmers in this area. We do, however, have some concerns regarding new guidelines that affect growers who wish to enter this program for the first time and growers who have to renew policies.

First, there is concern regarding the requirement that there be at least three miles of non-contiguous land that separate proposed section equivalents with the same farm serial number. This requirement coupled with the stipulation that one-square mile grids be placed in the center of producers' fields will severely limit the number of new units eligible for section equivalent coverage.

Second, we have misgivings regarding the prohibition of the use of man-made boundaries (e.g. roads) to divide single farm serial numbers. We believe these two conditions will drastically reduce the number of acres of land that will be enrolled in any risk management program. Finally, we seek clarification on what would constitute a "change in operation" under the rules, which would negate "grandfathering" for those registered in 2005.

After consulting with producers from our states, we believe that the best solution to this problem is allowing growers to enroll units under the same conditions as acres enrolled in 2005 written agreements. By using past requirements, the number of acres protected by the RMA will be maximized, providing the most benefit.

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We appreciate your careful consideration of our request and look forward to working with you to develop regulations that will maximize the use of section equivalent policies. The deadline for our growers to enroll 2006 acreage is March 15, 2006, it is imperative that we resolve this issue as soon as possible.

Sincerely,

Susan M. Collins

Allen Fiedt

Rick Sutorius

Tim Holden

Allyson G. Schwartz

Thomas Rylands

Don Shroeder

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